

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CLARA MCALLISTER,	)	
	)	
Plaintiff,	)	
	)	Case No. 24-cv-1848
v.	)	
	)	Judge John Robert Blakey
THE PARTNERSHIPS and	)	
UNINCORPORATED ASSOCIATIONS	)	
IDENTIFIED ON SCHEDULE "A",	)	
	)	
Defendants.	)	

**PRELIMINARY INJUNCTION ORDER**

Plaintiff, Clara McAllister, having filed its complaint for Federal Copyright Infringement, and having moved for a Preliminary injunction against the Defendants, and the Court having considered the complaint, declarations, exhibits, and memorandum of law filed in support, finds as follows:

This Court finds, in the absence of adversarial presentation, that it has personal jurisdiction over Defendants because Defendants directly target their business activities toward consumers in the United States, including Illinois. Specifically, McAllister has provided a basis to conclude that Defendants have targeted sales to Illinois residents by setting up and operating e-commerce stores that target United States consumers using one or more seller aliases, offer shipping to the United States, including Illinois, and have sold products using infringing versions of McAllister's federally registered copyrights, which are protected by U.S. Copyright Registration

Nos. VA 2-372-605, VA 2-372-607 and VA 2-372-609 (the “Clara McAllister Works”) to residents of Illinois.

This Court also finds that issuing this Order without notice pursuant to Rule 65(b)(1) of the Federal Rules of Civil Procedure is appropriate because McAllister has presented specific facts in the Declaration of Clara McAllister in support of the Motion and accompanying evidence clearly showing that immediate and irreparable injury, loss, or damage will result to the movant before the adverse party can be heard in opposition. Specifically, in the absence of an *ex parte* Order, Defendants could and likely would move any assets from accounts in financial institutions under this Court’s jurisdiction to off-shore accounts. Accordingly, this Court orders that:

1. Defendants, their officers, agents, servants, employees, attorneys, and all persons acting for, with, by, through, under, or in active concert with them be temporarily enjoined and restrained from:
  - a. using the Clara McAllister Works or any reproductions, infringing copies, or colorable imitations in any manner in connection with the distribution, marketing, advertising, offering for sale, or sale of any product that is not a genuine McAllister product or not authorized by McAllister to be sold in connection with the Clara McAllister Works;
  - b. passing off, inducing, or enabling others to sell or pass off any product as a genuine McAllister product or any other product produced by McAllister, that is not McAllister’ or not produced under the authorization, control, or supervision of McAllister and approved by McAllister for sale under the

Clara McAllister Works;

- c. committing any acts calculated to cause consumers to believe that Defendants' products are those sold under the authorization, control, or supervision of McAllister, or are sponsored by, approved by, or otherwise connected with McAllister; and
  - d. manufacturing, shipping, delivering, holding for sale, transferring or otherwise moving, storing, distributing, returning, or otherwise disposing of, in any manner, products or inventory not manufactured by or for McAllister, nor authorized by McAllister to be sold or offered for sale, and which bear any of McAllister' copyrights, including the Clara McAllister Works, or any reproductions, infringing copies, or colorable imitations.
2. Defendants, their affiliates, officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through, under or in active concert with them be enjoined and restrained from:
- a. Moving, destroying, or otherwise disposing of any items, merchandise or documents relating to the Counterfeit Products, Defendants' infringing websites, and/or Defendants' assets and operation; and
  - b. Removing, destroying, or otherwise disposing of computer files, electronic files, business records, or documents relating to any of Defendants' infringing websites, assets, operations, or relating in any way to the manufacture, acquisition, purchase, distribution or sale of Counterfeit

Products, or any reproduction, copy or colorable imitation of the  
McAllister Copyrights.

3. Each Defendant, within fourteen (14) days after receiving notice of this Order, shall serve upon Plaintiff a written report under oath providing: (a) their true name and physical address; (b) all websites and online marketplace accounts on any platform that they own and/or operate; (c) their financial accounts, including but not limited to all Alibaba/AliExpress, Amazon, eBay, Wish, Walmart, JoyBuy, PayPal, Western Union, Payoneer, Stripe, Worldfirst, etc., accounts; and (d) the steps taken by each Defendant to comply with paragraphs 1(a)–(i) and 2(a)–(b), above.
4. Plaintiffs may immediately commence discovery by providing actual notice, pursuant to subpoena or otherwise, of this Order to any of the following parties: (1) Defendants, their agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them; (2) any banks, savings and loan associations, payment processors or other financial institutions, including without limitation, Amazon, eBay, Wish, Walmart, TopHatter, Ali Express, AliBaba, PayPal, Inc., Western Union, Payoneer, Stripe, Worldfirst, etc. or other merchant account providers, payment provider, third party processors, credit card associations (i.e. MasterCard and VISA) that receive payments or hold assets on Defendants' behalf; and (3) any third party service providers, including without limitation, ISPs, back-end service providers, web designers, sponsored search engine or ad-word providers,

shippers, domain name registrars, domain name registries or online third-party sellers who have provided services for Defendants (collectively, “Third Party Providers”) shall, within five (5) days after receipt of such notice, provide copies of all documents and records in such person or entity’s possession or control relating to:

- a. The identities and addresses of Defendants, their agents, servants, employees, confederates, and any persons acting in concert or participation with them and the locations and identities of Defendants’ operations, including without limitation, identifying information associated with Defendants’ infringing webstores websites and financial accounts;
- b. the nature of Defendants’ operations and all associated sales, methods of payment for services and financial information, including, without limitation, identifying information associated with the infringing websites and Defendants’ financial accounts, as well as providing a full accounting of Defendants’ sales and listing history related to the infringing websites;
- c. Defendants’ infringing webstores, websites and any domain name registered by Defendants; and
- d. Any financial accounts owned or controlled by Defendants, including their agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them, including such accounts residing with or under the control of any banks, savings and loan associations, payment processors or other financial institutions, including

without limitation, Amazon, eBay, Wish, Walmart, TopHatter, Ali Express, Alibaba, PayPal, Inc., Western Union, Payoneer, Stripe, Worldfirst, or other merchant account providers, payment providers, third party processors, and credit card associations (i.e., MasterCard and VISA).

5. Defendants and any persons in active concert or participation with them who have actual notice of this Order shall be restrained and enjoined from transferring or disposing of any money or other of Defendants' assets until further ordered by this Court.
6. Amazon, eBay, Wish, Walmart, JoyBuy, Etsy, Ali Express, Alibaba, and their affiliates shall, within two (2) business days of receipt of this Order, block any money transfers and funds from being transferred by the Defendants identified in Schedule "A" until further ordered by this Court.
7. Any Third Party Providers, including Amazon, eBay, Inc., Walmart, Etsy, Stripe, Payoneer, or PayPal shall, within seven (7) calendar days of receipt of this Order:
  - a. locate all accounts and funds connected to Defendants' Defendant Internet Stores, including, but not limited to, any financial accounts connected to the information listed in Schedule A hereto, the e-mail addresses identified in Exhibit 2 to the Declaration of Clara McAllister, and any e-mail addresses provided for Defendants by third parties; and
  - b. restrain and enjoin any such accounts or funds from transferring or disposing of any money or other of Defendants' assets until further order by

this Court.

8. Any banks, savings and loan associations, payment processors, or other financial institutions, for any Defendant or any of Defendants' infringing websites, shall within two (2) business days of receipt of this Order:
  - a. locate all accounts and funds connected to Defendants and the infringing websites, including, but not limited to, any financial accounts connected to the information listed in Schedule A hereto and any e-mail addresses provided for Defendants by third parties; and
  - b. restrain and enjoin any such accounts or funds that are based in foreign jurisdictions, including but not limited to China and Hong Kong, from transferring or disposing of any money or other of Defendants' assets until further ordered by this Court.
9. Plaintiffs may immediately commence discovery by providing actual notice, pursuant to subpoena or otherwise, of this Order to any of the following parties:
  - (1) Defendants, their agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them;
  - (2) any banks, savings and loan associations, payment processors or other financial institutions, including without limitation, PayPal, Inc., Payoneer, Stripe, WorldFirst, Bill.com or other merchant account providers, payment provider, third party processors, credit card associations (i.e. MasterCard and VISA) that receive payments or hold assets on Defendants' behalf; and
  - (3) any third party service providers, including without limitation, ISPs, back-end service

providers, web designers, sponsored search engine or ad-word providers, shippers, domain name registrars, domain name registries or online third-party sellers who have provided services for Defendants (collectively, “Third Party Providers”) shall, within five (5) days after receipt of such notice, provide copies of all documents and records in such person or entity’s possession or control relating to:

- a. The identities and addresses of Defendants, their agents, servants, employees, confederates, and any persons acting in concert or participation with them and the locations and identities of Defendants’ operations, including without limitation, identifying information associated with Defendants’ infringing websites and financial accounts;
- b. the nature of Defendants’ operations and all associated sales, methods of payment for services and financial information, including, without limitation, identifying information associated with the infringing websites and Defendants’ financial accounts, as well as providing a full accounting of Defendants’ sales and listing history related to the infringing websites;
- c. Defendants’ infringing websites and any domain name registered by Defendants; and
- d. Any financial accounts owned or controlled by Defendants, including their agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them, including such accounts residing with or under the control of any banks, savings and loan




associations, payment processors or other financial institutions, including without limitation, PayPal, Inc., Western Union, MoneyGram, or other merchant account providers, payment providers, third party processors, and credit card associations (i.e., MasterCard and VISA).

10. Defendants and any persons in active concert or participation with them who have actual notice of this Order shall be temporarily restrained and enjoined from transferring or disposing of any money or other of Defendants' assets until further ordered by this Court.
11. This Order shall apply to the infringing Webstores and any other stores properly brought to this Court's attention and verified by sworn affidavit that verifies such new Webstores are being used by Defendants for the purpose of counterfeiting the McAllister Copyrights and/or unfairly competing with Plaintiff in connection with search engine results pages.
12. Upon two (2) days' written notice Plaintiff or on shorter notice as set by this Court, any Defendant may, upon proper showing, appear and move to dissolve or modify this Order upon an appropriate evidentiary showing by Defendant.
13. The \$10,000 bond posted by Plaintiff shall remain with the Court until a final disposition of this case or until this Preliminary Injunction is terminated.
14. All previously sealed documents are hereby unsealed.

Dated: May 1, 2024

Entered:

  
John Robert Blakey  
United States District Judge

## Schedule A

<b>Doe</b>	<b>Store Name</b>	<b>Merchant ID</b>
1	BIGYUANRUN	AEHKUUFREGOIH8
2	Castle Fairy	A10HFUOMELMZ30
3	CHUANGYANKEJI	A23OE2UPDKM6AJ
4	CHULIMO	A2VLIMGWNZT7UW
5	Czmiddle	AJ6N0B74P80S9
6	DEYIDIY	A2UUQ9V1XG5Y92
7	DreamGo	A2OT3LCZNPECZY
8	DZYUTING	A385TTVLGV1S6X
9	Echoes Store	A1A5YZHQNQJ1FF
10	erosebridal	A1DYWTHAQ0V0XG
11	erzhouqing	A8YADYRPWSR6X
12	FGFDDDDDD	AKTYVBVC8A03T
13	Fire Work	AE7V0WNZY8C80
14	FKELYI	A3PPWDB98LZ8EN
15	FOREVERYONGQIAN	A1SKMXES748WE4
16	FUGIDOG	A10GVA0P041DF9
17	fuyanxieye	A13VVP6KJ3DXK9
18	GIFTPUZZ	A1J3DTDZQPBSV1
19	guangzhoumaixunshangmaoyouxiangongsi	A3O79LX4PG7WG9
20	HAI FENG UK	A199DUID2GXBKG
21	haikoulonghuaajunyubaihuopu	AQH22JX9ZOLKW
22	haikoumeilancancanya	A1KWIHCP0PNNWT
23	HAODIYYE	A30VLBRC0QY5SX
24	HeartWorship	A36ASSFB6GBA4I
25	Hturdy Store	A1RMXAAQ5V1U02
26	Hun Zi King	ASDMD3SDO5IKD
27	Jubo Store	A2WP1S67H3Y2S
29	junzan	AG51URJG8JSBE
30	kaishengshop	A31R5VYWW0VLQ9
31	kaiwaiiwallplate	A2HAMRHZYYV0IG
32	KangSZ	A14U9X8OWFMA4G
33	KTHOFCY	A2FIMV9W7OSB90
34	LEHA	A238PVCT66DD01
35	LiHui shop	A1I5PA15P0G5KG

37	liu2020bin1	AQI1PQ04GLOML
38	Luandirect	A1C906W1M7Q8KE
39	Lukinuo	ADXG4U7HHWFMD
40	Manchao	ALJIOJRP43LTR
41	My All World-US	
42	NongNong Store	A3FPXDEGQPIDZO
43	Oneigo	A2NYC7L9OBTQQT
44	OnlineGo	A2L50EJDJ3NPF8
45	Printpub	A2Y5ALQHG2WZ2Z
46	Putian Ruixin Trade Co.,LTD	A13JBA3CWPWSFG
47	putianshixiuyuqujujirongmaoyiyouxiangongsi	A3RRG7UY9C89RS
48	quanzhoushiguaicongwangluokejiyouxiangongsi	A1BUZQASOCLEB
49	quanzhoushikaichi	A3S2RA35EAOT5X
50	quanzhoushikehuanwangluokejiyouxiangongsi	A25BHRVR90U117
51	quanzhoushiluojianggukunshenggongyilipinchang	AH7P3XFF4SZCE
52	quanzhouweiyue	AGDQHBI6UR32U
53	qzxingqiang	A1YUQTX5DSHM9U
54	RBfish	AMDCLYOF672HM
55	RUORAN	A2FCIXRUSR7QSY
56	Sangiacca	
57	Sansan Derect	AXTE6NGJTCFY0
58	sfqfjbhd	AU3VLP00JDYNW
59	showudesigns workshop	A1G3N1A8WAEAJ4
60	Strassiwo	A3EOSQV0861MG
62	T-HAO	A1KX3VY38BVVO5
63	taiyuanyixin	A12O2NCBBV7RXX
64	TerryBDoyalp	A29O7M82277TNV
65	tiansheng2386	
67	TODIYADDU	
68	Upetstory	A1TLATCNPJN813
69	VeGuude	A1DTTKIA0V2M9E
70	Wen Wen department store decoration poster shop	A2OBBP6C7P4IQZ
71	WhatAGoodDay	AGMBPIRR0LGM8
72	XINSHENGDAFUWU	
73	XMMXC	A1CUGFCR3O8IQU
74	XT0518	
75	Xuefeng poster decoration shop	
76	Yike Jianshe	AXEQ125WGRX59
77	Yisharui	A3M5EZ7R3B6A8A

78	YVONNE'S JEWELRY ORIGINAL DESIGN STUDIO	A1X567KFAJEE24
79	ZHENGHENPP	AUORVE5R8A1S1
80	zhengzhoulizhiyuanshipinyouxiangongsi	A29M1Y4QABLRD5
81	zhongweikuajing	
82	zlnhuazelushangmaoxing	A1EXHE4RJFF3HA
83	周口书贵商贸有限公司	AX95L2AOKCS3W
84	CHUNTIANWANG	
85	Gruntai209	A26I4XYNXIIXYP
86	haolindiandongzixingcheweixiufu wubu	A1EZ1Q3NW8I2I5
87	quanzhoushilichengqudouleerdianzishangwuLtd	A18721D07T75UX
88	tongshanxianyunnuobaihuodian	A1TUYM707RNH1P
89	UZZUHI	
90	wanzaixianyunniaozhenbaihuodian	A3THJVJMU YBD2R
91	zengduquluepuzhibaihuodian	A3GZVWICUW2C4X
92	Owl Online Shopping	Owl Online Shopping
93	Diamonds Queen	Diamonds Queen
94	aestheticbtique	aestheticbtique
95	PrintsMaster	PrintsMaster
97	MPGLOBAL	MPGLOBAL
98	Binienty	101254084
100	Kuiaobaty	101258241
101	Pzuqiu	101259922
102	Renewold	101254091
103	Suhoaziia	101338729